STATE OF MISSOURI IT OF NATURAL RESOURCES

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Ethan Shackelford, E.I. Region 1 Engineer Waste Corporation of Missouri, Inc. 33924 Olathe Dr. Lebanon, MO 65536

RE: Black Oak Recycling and Disposal Facility

Permit Number 0122905

Higher Operating Values Request

Dear Mr. Shackelford:

This letter is in response to the submittal dated January 20, 2016, prepared by you. In that submittal, the facility requested various higher operating values for landfill gas extraction wells at the Black Oak R&D Facility (Black Oak).

We received and evaluated your request along with the additional data from our files and the facility. While we are not granting all requests as outlined in your January 1, 2016, letter, we do agree the data shows the granted Higher Operating Values below will not cause an oxidation event or significantly inhibit the anaerobic decomposition as outlined in 40 CFR 60.753(c).

Below is a table derived from page 5 of the submittal dated January 20, 2016. The temperatures listed in the "Approved HOV" column are the compliance limits for the facility.

Well No.	Current HOV or NSPS	Proposed HOV	Approved HOV
	Limit Fahrenheit (F)	Fahrenheit (F)	Fahrenheit (F)
GW-00004	140 F	150 F	145 F
GW-0008R	140 F	140 F	140 F
GW-00025	140 F	145 F	140 F
GW-00027	145 F	155 F	145 F
GW-00006	131 F	140 F	140 F
GW-00009	131 F	135 F	135 F
GW-00026	131 F	135 F	135 F
GW-00039	131 F	135 F	135 F
GW-00067	131 F	135 F	135 F
GW-00078	131 F	135 F	135 F
GW-00079	131 F	145 F	140 F
GW-00100	131 F	145 F	140 F
GW-0101R	131 F	145 F	140 F



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REQUIREMENTS:

- 1. This approval applies only to those Missouri Department of Natural Resources' Air Pollution Control Program statutes, regulations, and 40 CFR 60.753(c) and not to any other state or local rule or ordinance.
- 2. This approval is contingent on applying an additional 6 inches of clay or other impermeable covering on the surface of the landfill in sufficient diameter as approved by the Solid Waste Management Program (SWMP) to cover the zone of influence for each extraction well listed above. Within forty-five (45) days of the date of this letter, provide the SWMP and APCP with the cover plan. This plan should include the type of material and design of the cover, quality assurance/quality control plan for placement of the cover, estimated zone of influence of the extraction wells, maintenance plan for the cover, drawing that shows the location of the cover, and schedule for placing the cover.
- 3. This approval is also contingent upon continued and maintained de-watering of all extraction wells with low flow pumps.
- 4. This approval is also contingent upon continued temperature and gas monitoring at the wellhead for each well listed above at least weekly. The temperature data, oxygen percent by volume, carbon dioxide percent by volume and balance gases for each measuring event shall be submitted by the close of business on the 5th day of each month for the previous month. Any temperature readings above the approved limit for any gas extraction wells on the landfill shall be reported on an "Excess Emission" reporting form within ten (10) days of the occurrence.
- 5. This approval will automatically expire on January 1, 2018, unless otherwise addressed or revised in correspondence.

If you have any comments or questions, please contact me at (573) 751-6415, or at the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Derek Apel

Environmental Specialist

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DA:ck

c: David Drilling, Solid Waste Management Program Charlene Fitch, Solid Waste Management Program Katherine Huxol, Solid Waste Management Program Southwest Regional Office via Electronic Shared File